# IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WISCONSIN

2018 AUG -2 AM 11:56

SEALED

PETER OPPENEE ERK US DIST CO WO DE VI

UNITED STATES OF AMERICA

**INDICTMENT** 

v.

DAVID OHMAR HARRIS,

Case No. 18 - CR - 113 - WMC

18 U.S.C. § 2251(a)

18 U.S.C. § 875(d)

18 U.S.C. § 2261A(2)(B)

Defendant.

THE GRAND JURY CHARGES:

# COUNT 1

Between on or about December 1, 2016, and on or about August 20, 2017, exact date unknown, in the Western District of Wisconsin and elsewhere, the defendant,

## DAVID OHMAR HARRIS,

knowingly and intentionally used, persuaded, induced, and coerced Known Victim #1, an individual who had not attained the age of 18 years, to engage in sexually explicit conduct for the purpose of transmitting a live visual depiction of such conduct, and such conduct was actually transmitted using any means or facility of interstate commerce.

(In violation of Title 18, United States Code, Section 2251(a)).

#### COUNT 2

On or about June 11, 2018, in the Western District of Wisconsin and elsewhere, the defendant,

# DAVID OHMAR HARRIS,

knowingly used, persuaded, induced, and coerced Known Victim #1, an individual who had not attained the age of 18 years, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, and such visual depictions were transmitted using any means or facility of interstate commerce, specifically, visual depictions of KV #1 masturbating were transmitted via Facebook.

(In violation of Title 18, United States Code, Section 2251(a)).

# COUNT 3

On or about June 11, 2018, in the Western District of Wisconsin and elsewhere, the defendant,

### DAVID OHMAR HARRIS,

with the intent to extort a thing of value from Known Victim #1, knowingly transmitted in interstate commerce communications containing threats to injure the reputation of Known Victim #1.

(In violation of Title 18, United States Code, Section 875(d)).

#### COUNT 4

Between on or about December 1, 2016, to on or about June 12, 2018, in the Western District of Wisconsin and elsewhere, the defendant,

## DAVID OHMAR HARRIS,

with the intent to harass, intimidate, and cause substantial emotional distress to Known Victim #1, used facilities of interstate and foreign commerce, including Facebook and Kik, to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to Known Victim #1.

(In violation of Title 18, United States Code, Section 2261A(2)(B)).

SCOTT C. BLADER United States Attorney A TRUE BILL

PŖEŚIDING JUROR

Indictment returned: 2 dly